



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/AFM/KCB
F. #2018R01047

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 27, 2022

By Email and ECF

Samuel M. Braverman
Albert Y. Dayan
Kenneth J. Kaplan
John S. Wallenstein
Richard D. Willstatter

Re: United States v. Jack Cabasso, et al.
Criminal Docket No. 19-CR-582 (DRH)

Dear Counsel:

The government has made available a further production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the disclosures of Rule 16 discovery produced to individual defendants on January 14, 2020, and November 18, 2020, and to all defendants on June 24, 2020, July 2, 2020, July 10, 2020, July 31, 2020, September 17, 2020, October 16, 2020, November 24, 2020, December 17, 2020, February 11, 2021, February 19, 2021, July 9, 2021, July 23, 2021, August 17, 2021 and November 3, 2021. The government renews its request for reciprocal discovery from the defendants.

The materials produced today are subject to the protective order entered in this case on May 29, 2020. They consist of extractions of electronic devices seized by the government,¹ contracts between Aventura and the government, and photographs of seized Aventura products.

1. Extractions of Mobile Electronic Devices

Each extraction of a mobile electronic device in today's production is identified below by reference to its "1B" number (a unique identifier assigned by the FBI), as well as the

¹ The mobile device extractions are being produced to all defendants with the parties' prior consent.

location where it was seized, the description from the relevant manifest (with identifying numbers partially redacted), and the Bates number assigned for discovery purposes.

Item #	Seizing Address	Seizing Location	Description	Bates Number
1B1	Cabasso Residence	Person (Jack Cabasso)	Apple I Phone MODEL NUMBER : A1965 SERIAL NUMBER : **0075	AVT_MEDIA_034
1B8	Cabasso Residence	Room T	PINK I-PAD WITH BLACK CASE, MODEL A1674, S/N **QH259	AVT_MEDIA_035
1B30	Cabasso Residence	Room T	IPHONE WHITE, MODEL A1533, IMEI # **500411	AVT_MEDIA_036
1B31	Cabasso Residence	Room T	SILVER I-PAD IN SILVER BLACK CASE, MODEL A1709, S/N: **02HPDV	AVT_MEDIA_037
1B32	Cabasso Residence	Room T	WHITE/SILVER IPHONE, MODEL: A1549, IMEI: **61973	AVT_MEDIA_038
1B36	Cabasso Residence	Room G	ONE CELLOPHANE CONTAINING: (1) I-PAD, MODEL A1475, S/N: **WF4J	AVT_MEDIA_039
1B45	Cabasso Residence	Room E	IPHONE WITH CLEAR PLASTIC CASE, IMEI #: **TPJCL7	AVT_MEDIA_040

This material has been placed on USAfx, the government's online file sharing platform. It is also available at Dupe Coop, where it can be obtained by requesting Production 13.

More information about each device is available in the government's production of October 16, 2020; in particular, on that date, a schematic showing letter designations for various spaces within the Cabasso Residence was produced as AVENTURA_0000080524-AVENTURA_0000080526.

2. Contracts

The government has previously produced in discovery approximately 71 contracts and task orders between Aventura and U.S. government agencies. Under cover of this letter, the government is producing via USAfx approximately 33 more contracts and task orders, Bates numbered AVENTURA_0000094831 - AVENTURA_0000095396. These items are designated Sensitive Discovery Material pursuant to the protective order in this case.

The government is also producing via USAfx a spreadsheet (Bates number AVENTURA_0000095397) that identifies each contract in the government's possession and the corresponding Bates range under which each contract (and its associated files, if any) was produced to the defendants in discovery. This spreadsheet, which the government has created to assist defense counsel in reviewing the discovery, is subject to revision, and is also designated Sensitive Discovery Material.

3. Seized Aventura Inventory

A manifest of Aventura products seized during the execution of a search warrant at 48 Mall Drive is being produced via USAfx under Bates number AVENTURA_0000095445. Photographs of the cartons seized are also being produced via USAfx under Bates numbers AVENTURA_0000095398-AVENTURA_0000095444. You may inspect these items in person by arrangement with the government.

4. Further Discovery

The government expects to make a production of a large volume of electronically stored information identified through searches performed in response to various defense discovery requests and through further government review of the email in its possession. The government's e-discovery facility has advised that it expects to complete the processing of this production on February 2, 2022, and the government will make the production to the defendants through Dupe Coop as soon as the government receives the production.

5. Production of Complete Datasets

In addition, as the government advised you in its letter dated January 10, 2022 (the "January 10 letter"), and with the remaining defendants' consent, the government expects to provide to all of the remaining defendants copies of Jack Cabasso's Skype and Hotmail accounts, as well as an image of 1B289, the Microsoft Exchange server seized from Aventura's offices that contains the contents of numerous Aventura corporate email accounts used by its employees. The government also expects to make available the contents of the Aventura corporate email accounts that the government obtained from Rackspace and Microsoft, to the extent Aventura has not already shared its copy of this information.

As we noted in the January 10 Letter, these copies include the complete data sets from which the government has obtained and produced electronically stored information discoverable under Rule 16 and other applicable law. Thus, the information being disclosed to you is broader than that which the government is required to produce to you under applicable law.

The government believes that these forthcoming productions of discovery will substantially complete the government's productions of material discoverable under Rule 16 and applicable law. The government's discovery obligations are continuing obligations, however, and the government will supplement its productions with additional disclosures if it identifies additional material discoverable under applicable law.

Please do not hesitate to contact us with any questions or if you wish to discuss a resolution of this matter.

Very truly yours,

BREON PEACE
United States Attorney

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Enclosures

cc: Clerk of the Court (DRH) (by ECF) (without enclosures)